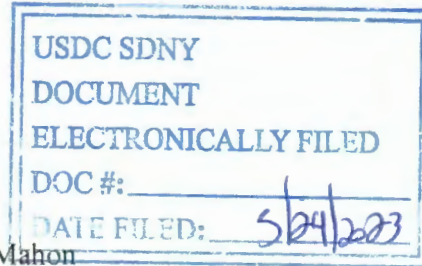


THE MAUL FIRM, P.C.

Anthony F. Maul
Attorney at Law
afmaul@maulfirm.com

68 Jay Street, Suite 201
Brooklyn, NY 11201
(718) 395-4918



May 24, 2023

VIA ECF

Honorable Colleen McMahon
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Liberty Wellness Chiropractic v. Empire HealthChoice HMO, Inc. d/b/a Empire
Blue Cross Blue Shield HMO, et al.*, Case No. 1:21-cv-02132-CM

5/24/2023

Dear Judge McMahon:

MEMO ENDORSED

This Firm represents plaintiff Liberty Wellness Chiropractic ("Liberty") in the above-entitled action. I am writing on behalf of all Parties to request a 60-day extension of the current deadlines to allow the parties to continue negotiating a potential resolution. This is the parties' first request for an extension of the current deadlines.

On February 10, 2023, the Court entered a Decision and Order denying the Defendant's motion to dismiss and converting the motion to one for summary judgment (ECF No. 39). Among other things, the Court ordered the parties to conduct limited discovery and for Defendants to supplement their motion by **June 12, 2023**.

After reviewing the Decision and Order and meeting and conferring, the Parties expressed a mutual interest in exploring settlement and have been engaged in settlement negotiations, which have taken considerable amount of time given the number of claims at issue (nearly 2000). The Parties submit that a 60-day extension of the limited discovery schedule would facilitate a potential settlement by preserving resources while the Parties explore an amicable resolution.

The Parties respectfully request the current deadlines be extended for 60 days resulting in a new deadline to complete limited discovery and for Defendants to supplement their motion through and including **August 11, 2023**.

MAY 24, 2023

Page 2

The parties greatly appreciate your attention to this matter.

Best Regards,

/s/ Anthony F. Maul

Anthony F. Maul

The Maul Firm, P.C.